

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,	:	
	:	
PLAINTIFF,	:	
	:	
v.	:	CIVIL NO. 15-573-MJR-PMF
	:	
\$96,480.00 IN UNITED STATES	:	
CURRENCY,	:	
	:	
	:	
DEFENDANTS.	:	

ANSWER TO CLAIMANT HUGHES COUNTERCLAIM

Now comes the United States of America, by and through its attorneys, Stephen R. Wigginton, United States Attorney for the Southern District of Illinois, and Jennifer Hudson, Assistant United States Attorney, and Answers claimant Jason A. Hughes' counterclaim.

General Denial

Claimant's statement does not require a response as it is not a counterclaim. If, however, a response is required, Plaintiff denies.

Affirmative Defenses

Claimant's affirmative defenses, paragraphs A1-A12 inclusive, do not require a response as they are not counterclaims. If, however, a response is required, Plaintiff denies.

Counterclaim

Count I

Attorney's Fees and Costs

1. Claimant asserts "Attorney's Fees and Costs" as count one and cites the Asset Forfeiture Reform Act. Title 18 United States Code § 983 provides for fees in appropriate litigation. It also provides for monetary sanctions for persons filing frivolous claims. Neither constitute a

counterclaim. Thus, this count should be stricken. *See also* PL 106–185, April 25, 2000. If, however, a response is required, Plaintiff denies.

Count II

Claim for Additional Monies

1. Deny.
2. Deny.
3. Deny.

WHEREFORE, the United States respectfully requests that this Court strike Count I and find in favor of the United States, enter judgment in favor of the United States, and any other relief the Court deems just.

Respectfully submitted,

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United States Attorney

/s/ Jennifer Hudson
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